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MEMO ENDORSED

May 8, 2025

Via ECF

The Honorable Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Doreen Mastroianni
Case No.: 7:24-mj-04187-UA-2

Dear Judge Reznik:

The undersigned has been appointed to represent Ms. Doreen Mastroianni in the above-captioned matter. The defendant, Doreen Mastroianni, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Mastroianni seeks an Order from the Court to permit her to travel out of the District to Utica, New York on Saturday, May 17, 2025 to help her son look for an apartment.

In order to facilitate the defendant's request, the defendant will do the following:

1. Ms. Mastroianni will travel on Saturday, May 17, 2025 to Utica via automobile with her son, James Mastroianni.¹
2. Prior to traveling outside the Southern District of New York, Ms. Mastroianni agrees to provide her assigned probation officer with an itinerary that includes what time she will be departing and returning home.
3. Upon returning to the Southern District of New York, Ms. Mastroianni will telephone her probation officer and indicate that she has returned home.

Defendant's request is **GRANTED**.

With the advanced notification and approval from the Probation Office as described herein, the Court permits Ms. Mastroianni to travel to Utica, New York with her son James Mastroianni on May 17, 2025, subject to the conditions imposed by her Pretrial Services Officer.

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 5/8/2025

¹ James Mastroianni cosigned Ms. Mastroianni's bond as a Financially Responsible Person.

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4. United States Probation Officer Viosanny Harrison indicated to this office that Probation has no objection to Ms. Mastroianni's request.
5. Assistant United States Attorney Ryan W. Allison indicated that the government has no objection to the requested modification.

WHEREFORE, the defendant moves that the Court issue an Order permitting the defendant to travel with the advanced notification and approval from the Probation Office, to travel to Utica, New York with her son James Mastroianni on May 17, 2025 subject to the conditions imposed by her Pretrial Services Officer.

Respectfully Submitted

THE DEFENDANT,
Doreen Mastroianni

By: */s/ Bruce D. Koffsky*

BDK/dgb

cc: AUSA Ryan W. Allison via email
USPO Viosanny Harrison